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May 9, 2018

VIA ECF

Honorable Frederic Block United States District Court for the Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

RE: Wexler v. AT&T Corp., No. 15-cv-686 (FB-VVP)

Dear Judge Block:

I represent Plaintiff Eve Wexler in the above-referenced action. On May 8, 2018, the Court issued a Scheduling Order setting the pre-motion conference on Plaintiff's Motion for leave to amend complaint (Dkt. No. 56) for June 21, 2018. Unfortunately, my co-counsel, Keith Keogh, is unavailable on that date due to a prior commitment for a Court Hearing in St Louis Missouri.

I have conferred with counsel for Defendant AT&T Corp., and am authorized to state that the parties consent to this letter application seeking an adjournment of the pre-motion conference date. Both parties are available to appear for oral argument at any time on **June 28, 2018**, if that date is convenient for the Court. If the proposed date is not convenient, the parties will of course suggest additional dates for the Court's review.

Thank you for your consideration of this request.

Respectfully submitted,

James Giardina

Counsel for Plaintiff

cc: Archis Parasharami Evan Tager Christopher Houpt